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REMARKS

Reconsideration of this application is respectfully requested. Claims 1-16 are in this application and are presented for the Examiner's consideration in view of the following comments.

Claims 1 to 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,160,545 issued December 12, 2000 to Eyer et al. (*Eyer*) in view of the "Program Guide for Digital Television", ATSC Standard, Doc. A/55 (the *Guide*). Applicants respectfully maintain their disagreement as stated in Applicants' response filed on September 12, 2005, which is incorporated by reference herein.

In addition, Applicants also offer the following additional observations to the Examiner's latest remarks.

The combination of *Eyer* and the *Guide* does not yield Applicants' claimed invention. The fact is that the version_number shown on pages 7, 13 and 21 of the *Guide* **has the same definition**. In other words, it's the same number. It's just replicated in different tables and represents the version number of the WHOLE program guide. (*Guide*, p. 8, 13 and 21.)

In contrast, Applicants' claimed first version identifier and the second version identifier are updated differently. For example, Applicants' claim 1 requires a processor for determining a change in the secondary table by examining the second version identifier. In contrast, since the *Guide* requires that the version identifier represent the version number of the whole program guide, **it is not possible** to use the version numbers as defined in the *Guide* to distinguish a change to just a secondary table as required by Applicants' claims. Consequently, a combination of *Eyer* and the *Guide* does not yield Applicants' claimed invention.

Applicants do note that the Examiner states:

[a]lthough, a single version number is replicated in all of the tables, as indicated by Applicants, *these version number clearly differentiate to each other based on their corresponding Table_id value of each distinct table of pages 7, 13 and 21.*

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Office Action, 12/1/05, p.2; emphasis added.

However, **the Examiner is wrong**. The *Guide* is clear. Each of these version numbers is identically defined and represents the version number of the **WHOLE** program guide:

version_number — This 5-bit field is the version number of the whole program guide. The version number shall be incremented by 1 modulo 32 when a field in either the MPG or any SPG changes with the exception of the life_time and actual_time fields in the Master Guide Table.

The *Guide*, p. 8, 13 and 21, emphasis added.

If each of these version_numbers are the version number of the whole program guide the Examiner has no support for the above-italicized assertion.

Likewise, the combination of *Eyler* and the *Guide* does not yield Applicants' independent claim 8. In particular, Applicants' independent claim 8 requires a first version identifier and a second version identifier that are updated differently. As noted above, the version numbers defined in the *Guide* represent the whole program guide and, as such, are updated identically. As such, a combination of *Eyler* and the *Guide* does not yield Applicants' independent claim 8.

With regard to Applicants' independent claim 6, Applicants note the following. Claim 6 requires "partition identifiers" that are "dynamically re-partitionable". In this regard, the Examiner states:

Applicant's limitation "partitioning information" clearly reads on channel grouping; see page 24, section 5.4, 3rd paragraph, ... Channel Groupings .. and Fig. 5.7,The channel grouping number and channel number are reflected in the table_ID_extension field (see page 26).

Office Action, p. 3, emphasis added.

At the outset, the Examiner should note that channel groupings are not re-partitionable and, in fact, occur in a strict sequence:

[t]he channel information table may be divided into up to 16 sections (0 to 15), each of which corresponds to one channel grouping ...

[t]he entire CIT table is simply a concatenation of all the sections (channel groupings) in order.

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The *Guide*, p. 18; emphasis added.

Further, the above-noted *table_id_extension* simply associates a given event information table (EIT) with a particular section and channel in that section. As such, the *table_id_extension* is not dynamically re-partitionable since this is a part of the event information table that is fixed to a particular channel.

Finally, Applicants' independent claim 6 requires a processor "for identifying the re-assigned partition identifiers and for acquiring additional program guide data." The Examiner has not addressed this claim limitation. Indeed, Applicants request that the Examiner state with particularity what corresponds to applicants' claimed "partition identifier."

With regard to Applicants' independent claim 13, the Examiner states that:

the Examiner respectfully disagrees with Applicant because clearly the *Guide* is a database (see page 1, second 1-Scope, i.e., easily updated program guide data base." The examiner further cites Table 5.2 with database (*channel_grouping_list*) included within the ancillary information (Channel information i.e., *Start_channel[I]*), see page 11.

Office Action, p. 4, emphasis added.

Respectfully, the Examiner should note that Applicants' did not say the *Guide* did not describe a database — Applicants' stated that the *Guide* did not describe Applicants' claimed database. For example, Applicants' claim 13 requires "updatable cell numbers for indicating content change of a partition". Nowhere does the *Guide* describe this. As noted above, the version numbers defined in the *Guide* represent the entire *Guide*. It is not possible to determine what particular part of the *Guide* has changed.

In view of the above, even if one were to combine *Eyer* and the *Guide*, this combination does not describe, or suggest, the requirements of Applicants' independent claims 1, 6, 8 and 13. As such, Applicants' respective dependent claims 2-5, 7, 9-12 and 14-16 are also patentable over *Eyer* in view of the *Guide*. Therefore, Applicants respectfully submit that this rejection of claims 1-16 has been overcome.

As it is believed that all of the objections set forth in the Official Action have been fully met, favorable reconsideration and allowance are earnestly solicited. If.

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however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that the Examiner telephone Applicants' attorney in order to overcome any additional objections that the Examiner might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 07-0832 therefor.

Respectfully submitted
Mehmet Kemal Ozkan et al.

By


Joseph J. Opalach
Registration No.: 36,229
(609) 734-6839

Patent Operations
Thomson Licensing Inc.
P.O. Box 5312
Princeton, New Jersey 08543-5312
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Linda Tindall
Linda Tindall